

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

CIRCUIT CITY STORES, INC., *et al.*,

Debtors.

Case No. 08-35653-KRH
Chapter 11
(Jointly Administered)

MOTION TO ADMIT PERRY L. GOORMAN PRO HAC VICE

Pursuant to Local Bankruptcy Rule 2090-1(E)(2), Sheila deLa Cruz (the “Movant”), a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia, files this motion with the Court for an Order permitting admission of Perry L. Goorman, Esquire, of the Goorman Law Offices, 5290 DTC Parkway, Suite 170, Greenwood Village, CO 80111-2764, to appear and practice *pro hac vice* on behalf of The Denver Newspaper Agency, LLP (“DNA”) in the Chapter 11 bankruptcy proceedings commenced by the Debtors and the related adversary proceeding styled *Siegel v. The Denver Newspaper Agency, LLP* (Adv. Pro. No. 10-03339) (the “Adversary Proceeding”). In support thereof, the Movant states the following:

1. Perry L. Goorman is the founding partner of the Goorman Law Offices and has been retained by DNA in the Adversary Proceeding.

Robert S. Westermann (VSB No. 43294)
Sheila deLa Cruz (VSB No. 65395)
Hirschler Fleischer, P.C.
The Edgeworth Building
2100 East Cary Street
Richmond, Virginia 23223
P.O. Box 500
Richmond, Virginia 23218-0500
Phone: (804) 771-9500
Facsimile: (804) 644-0957
Email: rwestermann@hf-law.com
sdelacruz@hf-law.com

Perry L. Goorman, Esq.
Goorman Law Offices
5290 DTC Parkway, Suite 170
Greenwood Village, Colorado 80111-2764
Phone: (303) 220-5373
Email: plg@goormanlaw.com

2. He is an attorney licensed to practice law in the State of Colorado and has been a member in good standing of the Colorado Bar since 1977. Mr. Goorman is also licensed to practice law in the State of Arizona and has been a member in good standing of the Arizona Bar since 2000.

3. He is also admitted to practice in the United States District Court for the District of Colorado, the United States District Court for the District of Arizona, the United States Court of Appeals for the Ninth Circuit, the United States Court of Appeals for the Tenth Circuit, and the United States Supreme Court. A true and accurate copy of his *pro hac vice* application is attached hereto as **Exhibit A**.

4. Mr. Goorman is not the subject of any pending disciplinary or grievance proceedings.

5. He has read and shall be governed by the local rules of this Court, the rules of professional conduct and all other requirements governing the professional behavior of members of the Virginia Bar.

WHEREFORE, the Movant respectfully requests the entry of the order attached hereto as **Exhibit B**, authorizing Perry L. Goorman, Esquire, to appear *pro hac vice* in these jointly administered cases and the related Adversary Proceeding only, and for such other and further relief as the Court deems just and proper.

Dated: March 17, 2011

THE DENVER NEWSPAPER AGENCY, LLP

By: /s/ Sheila deLa Cruz

Counsel

Robert S. Westermann (VSB No. 43294)
Sheila deLa Cruz (VSB No. 65395)
Hirschler Fleischer, P.C.
The Edgeworth Building

2100 East Cary Street
Richmond, Virginia 23223
P.O. Box 500
Richmond, Virginia 23218-0500
Phone: (804) 771-9500
Facsimile: (804) 644-0957
Email: rwestermann@hf-law.com
sdelacruz@hf-law.com

and

Perry L. Goorman, Esq. (*pro hac vice* admission pending)
Goorman Law Offices
5290 DTC Parkway, Suite 170
Greenwood Village, CO 80111-2764
Phone: (303) 220-5373
plg@goormanlaw.com

Counsel for The Denver Newspaper Agency, LLP

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2011, I caused a true and correct copy of the foregoing Motion to be electronically served by the Court's CM/ECF system to counsel for all necessary parties, including counsel for the Debtors, the Trustee of the Circuit City Stores, Inc. Liquidating Trust, and to the Office of the U.S. Trustee

/s/ Sheila deLa Cruz
Counsel

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653, * Case Name In Re: Circuit City Stores, Inc.

PERSONAL STATEMENT

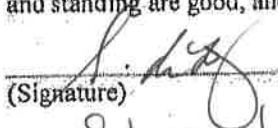
FULL NAME (no initials, please) PERRY LEE GOORMAN
Bar Identification Number 8302(6/0) ~~8302~~ 020167 (ARIZ)
Firm Name Goorman Law OFFICES
Firm Phone # 303 220 5373 Direct Dial # NA FAX # 303 770 6407
E-Mail Address: plg@goormanlaw.com
Office Mailing Address 5290 DTC Parkway, Suite 170, Greenwood Village, Co 80111
Name(s) of federal court(s) in which I have been admitted DIST. Ct Colorado; District Ct. (Arizona);
10th Circuit; 9th Circuit; U.S. Supreme Court
I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.


(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.


(Signature)

3/16/11
(Date)

Sheila de la Cruz
(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.



EXHIBIT B

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

CIRCUIT CITY STORES, INC., *et al.*,

Debtors.

Case No. 08-35653-KRH
Chapter 11
(Jointly Administered)

ORDER APPROVING ADMISSION PRO HAC VICE OF PERRY L. GOORMAN

This matter comes before the Court upon the Motion to Admit Perry L. Goorman *Pro Hac Vice* (the "Motion") filed by Sheila deLa Cruz, Esquire. The Motion requests the entry of an order approving the admission *pro hac vice* of Perry L. Goorman, Esquire, of the Goorman Law Offices, for the purpose of representing The Denver Newspaper Agency, LLP in the above-referenced bankruptcy case and the related adversary proceeding styled *Siegel v. The Denver Newspaper Agency, LLP* (Adv. Pro. No. 10-03339) (the "Adversary Proceeding"). Based upon the representations set forth in the Motion and Mr. Goorman's *pro hac vice* application, and finding it otherwise proper so to do, it is hereby:

ORDERED that Perry L. Goorman, Esquire, is hereby **ADMITTED** *pro hac vice* to practice before the Court in these bankruptcy proceedings and the Adversary Proceeding.

Robert S. Westermann (VSB No. 43294)
Sheila deLa Cruz (VSB No. 65395)
Hirschler Fleischer, P.C.
The Edgeworth Building
2100 East Cary Street
Richmond, Virginia 23223
P.O. Box 500
Richmond, Virginia 23218-0500
Phone: (804) 771-9500
Facsimile: (804) 644-0957
Email: rwestermann@hf-law.com
sdelacruz@hf-law.com

Perry L. Goorman, Esq.
Goorman Law Offices
5290 DTC Parkway, Suite 170
Greenwood Village, Colorado 80111-2764
Phone: (303) 220-5373
Email: plg@goormanlaw.com

Counsel for The Denver Newspaper Agency, LLP

Dated: _____
Richmond, Virginia

United States Bankruptcy Judge

Entered on Docket: _____

I ask for this:

/s/ Sheila deLa Cruz
David K. Spiro (VSB No. 28152)
Sheila deLa Cruz (VSB No. 65395)
Hirschler Fleischer, P.C.
The Edgeworth Building
2100 East Cary Street
Richmond, Virginia 23223
P.O. Box 500
Richmond, Virginia 23218-0500
Phone: (804) 771-9500
Facsimile: (804) 644-0957
Email: dspiro@hf-law.com
sdelacruz@hf-law.com

Local Counsel for The Denver Newspaper Agency, LLP

CERTIFICATE OF ENDORSEMENT

I hereby certify, under Local Rule 9022-1, that the foregoing Order has been endorsed by
and/or served upon all necessary parties.

/s/ Sheila deLa Cruz
Local Counsel